

**Amended Complaint**

August 8, 2023

CASE#: 23-CV-640-LJV

United States District Court  
Western District of New York

(Non-Prisoner Context)

1. CAPTION OF ACTION

A. Full Name of Plaintiff: Jameel Gordon

-vs-

B. Full Name(s) of Defendant(s):

1. The State University at Buffalo
2. The State University of New York
3. University at Buffalo Regional Institute
4. Blackstone Incorporated
5. Rick Gardner
6. Keiah Shauku
7. Hadar Borden
8. Empire State Development
9. 43 North
10. NY Ventures

2. STATEMENT OF JURISDICTION, VENUE AND NATURE OF SUIT

A. Basis of Jurisdiction in Federal Court: Violation of my Federal civil and constitutional rights.

B. Reason for Venue in the Western District: The State of New York is a co-defendant as well as entities of The State of New York, entities partnered with The State of New York, and employees of The State of New York.

C. Nature of Suit: It is a civil rights claim.



3. PARTIES TO THIS ACTION:

PLAINTIFFS INFORMATION:

Name of First Plaintiff: Jameel Gordon

Present Address: 1576 Sweet Home Road, Buffalo NY 14228

DEFENDANTS INFORMATION:

Name of First Defendant: The State University at Buffalo

Address of Defendant: 12 Capen Hall, Buffalo NU 14228

Name of Second Defendant: The State University of New York

Address of Defendant: 353 Broadway, Albany NY 12246

Name of Third Defendant: The University at Buffalo Regional Institute

Address of Defendant: 77 Goodell Street, Suite 302, Buffalo NY 14203

Name of Fourth Defendant: Blackstone Incorporated

Address of Defendant: 345 Park Avenue, New York, NY 10154

Name of Fifth Defendant: Rick Gardner

Official Position of Defendant: Associate Vice President for Economic  
Development at the University at Buffalo Business Entrepreneurship Partnership  
Department

Address of Defendant: 12 Capen Hall, Buffalo NY 14228

Name of Sixth Defendant: Keiah Shauku

Official Position of Defendant: Open4 Program Director at University of Buffalo  
Regional Institute

Address of Defendant: 77 Goodell Street, Suite 302, Buffalo NY 14228

Name of Seventh Defendant: Hadar Borden

Official Position of Defendant: Director of The Blackstone Launchpad at The  
University at Buffalo

Address of Defendant: 12 Capen Hall, Buffalo NU 14228

Name of Eighth Defendant: Empire State Development

Address of Defendant: 633 3rd Avenue, New York NY 10017

Name of Ninth Defendant: 43 North

Address of Defendant: 1 West Seneca Street Floor 24, Buffalo NY 14203

Name of Tenth Defendant: NY Ventures

Address of Defendant: 633 3rd Avenue, New York NY 10017

4. PREVIOUS LAWSUITS IN STATE AND FEDERAL COURT: N/A

5. Statement of Claim:

To the Honorable Lawrence J. Villardo,

First, I apologize for the vagueness of our initial claim as the civil complaint form and its instructions suggests we were to keep it as simple as possible. However, we are thankful for the opportunity to add clarity to our initial claim with this amendment.

In August of 2022 upon acceptance to the University at Buffalo I was informed about the Blackstone Launchpad Program at the University. The entrepreneurship program was suggested to me as I shared with members of my academic department that I was interested in launching a business venture while completing our degree program.

This led to a meeting with the Director of The Blackstone Launchpad, Hadar Borden. During our initial meeting Borden acknowledged that I was “too advanced” of an entrepreneur for her to work with however she invited us to participate in the program throughout the semester and we did.

Consequently to attending the programming at the Blackstone Launchpad, we continued our networking with members within the University community, and within the City of Buffalo. We had the privilege to develop relationships with members of Rick Gardner's team in the University's Business Entrepreneurship Partnership department which eventually led to us launching and housing our business venture within their incubator at the University's Baird Research Center.

During this time, a third party outside the University system attempted to connect us with Laura Quebral at the University at Buffalo Regional Institute. We never had the opportunity to meet with Laura Quebral as our communication was intercepted by Keiah Shauku a program director with the Regional Institute.

After meeting with Shauku in hopes of being able to connect with Quebral we shared more about our business venture as well as hopes for further development working with the University and hopes of receiving funding. We akin our venture to Google in which Shauku responded by sharing that “well, Larry & Sergei (the founders of Google) came from communities with deep pockets”. While surprised by the statement we were not discouraged.

However, as we continued to develop our venture independently of the University it was clear to us the nature of the discrimination and discriminatory actions that were to follow. For instance, Borden and her team often promoted a slogan “This is what an entrepreneur looks like” centered predominantly around East Indian, white, and female students. Emphasis was also centered around one particular entrepreneur, Dominic LaVigne, a white male who may or may not

be related to Dr. Marnie Lavigne, the President & CEO, of Launch NY another entity within this conglomerate not named in this suit. After a programming event that highlighted Dominic LaVigne, while wearing a t-shirt bearing the aforementioned slogan Borden stated to us that she was "looking forward to see what you build".

As we continued our development, we also emphasized the fact that it was our intent to remain independent, and we also intended to develop our venture as a family business. It is at this point that we experienced additional obstruction and discrimination.

Specifically, we received an invite to join the Empire State Development and 43North at a "0 to 1" - Investment & Resources for Startups event on June 13th, 2023 to also meet with members of NY Ventures and the Division of Science, Technology, and Innovation of New York State. After declining the invite because we had no interest in working with either of these entities we were completely blocked out of the entirety of the University's Entrepreneurship ecosystem and their funding because we desired to build a private family business. After being deprived additional support, the possibilities of additional funding, we were then informed by members of the Business Entrepreneurship Partnership department that our company had "graduated".

We think that we have been barred from continuing the development through the University's ecosystem because we refused to work with their business partners and wanted to continue our development with our own selected partners as a family business.

There was also emphasis that perhaps we should locate our business to the predominantly black neighborhoods on the East Side of Buffalo and off the University campus. We think this was suggested because of the nature of our business interests which seeks to provide solutions to all matters of social equality and human rights including my constitutional right to develop and operate a family business.

We also think that we were barred from additional opportunities because we have established ourselves as an economic development think tank servicing the region. As a black man, it has been evident to us that according to the State of New York, The University of Buffalo, it's partners and venture capital firms in the region, that I am only able to participate in economic development in the region if it's done through them, their partners, and on their terms. As a citizen of the United States of America, we believe this is a gross and inherent violation of our fourteenth amendment rights to be able to develop our family business freely without the obstruction and discrimination of the State of New York and their business partners.

Thank you!



James I. Gordon

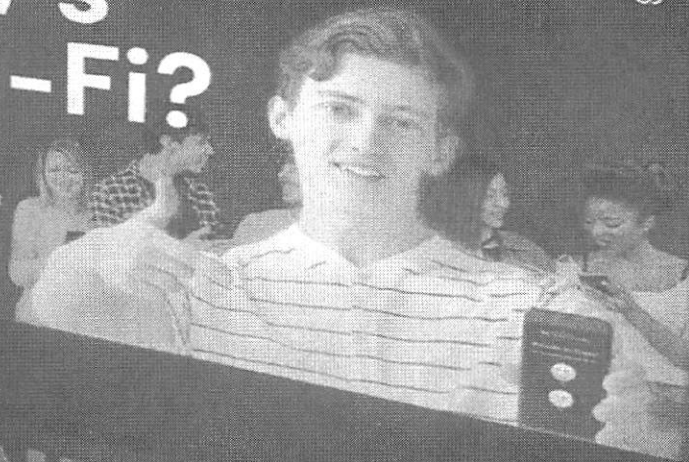




# How's the Wi-Fi?

University at Buffalo  
Information Technology

Look for these  
scannable  
stickers in select  
campus  
buildings to let  
us know.



## PRINT HERE







Jameel Gordon



10:19 AM

## **Join Empire State Development and 43North at '0 to 1 - Investment & Resources for Startups' on June 13th!**

Hello,

Empire State Development and 43North would like to extend an invitation for you and your team to attend an informational event on June 13<sup>th</sup> titled '0 to 1 – Investment & Resources for Startups'. Jennifer Tegan, Managing Director of NY Ventures and Heidi Knoblauch, Interim Director of the Division of Science, Technology, and Innovation, will discuss a suite of programs to help startups get the support they need to start, grow, and thrive, including multiple opportunities for venture investment.

You can find further details and a link to register below:

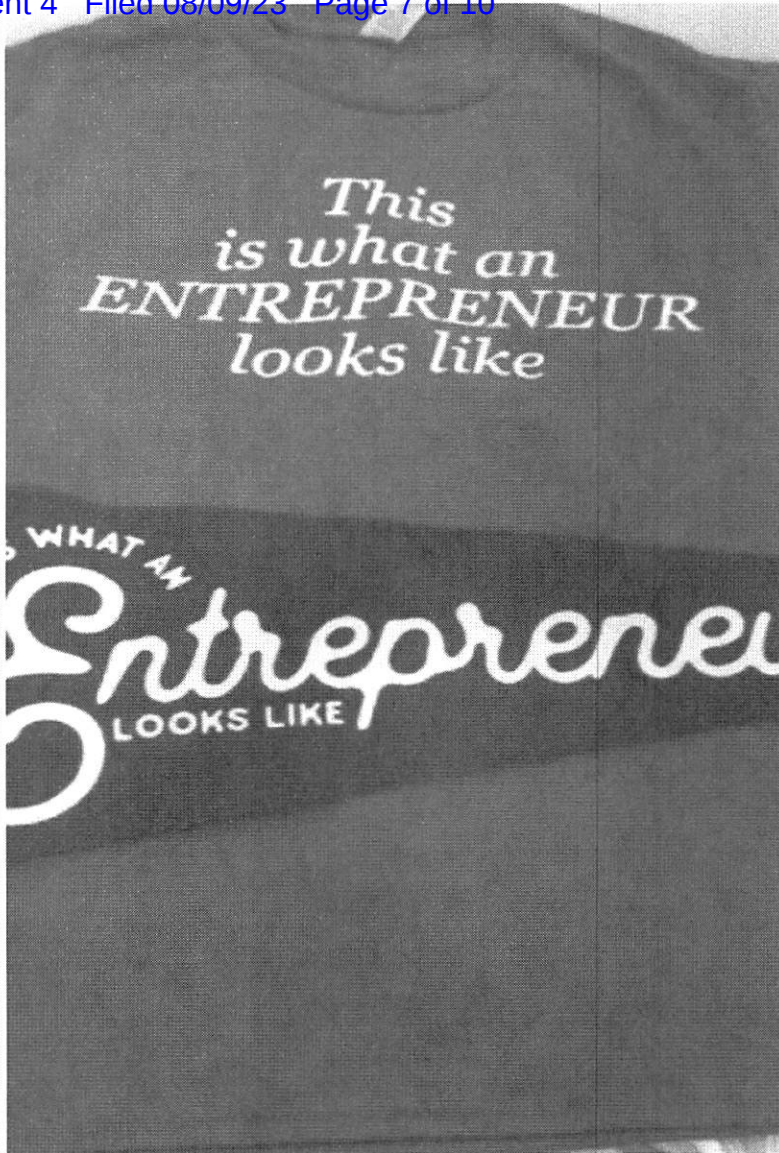
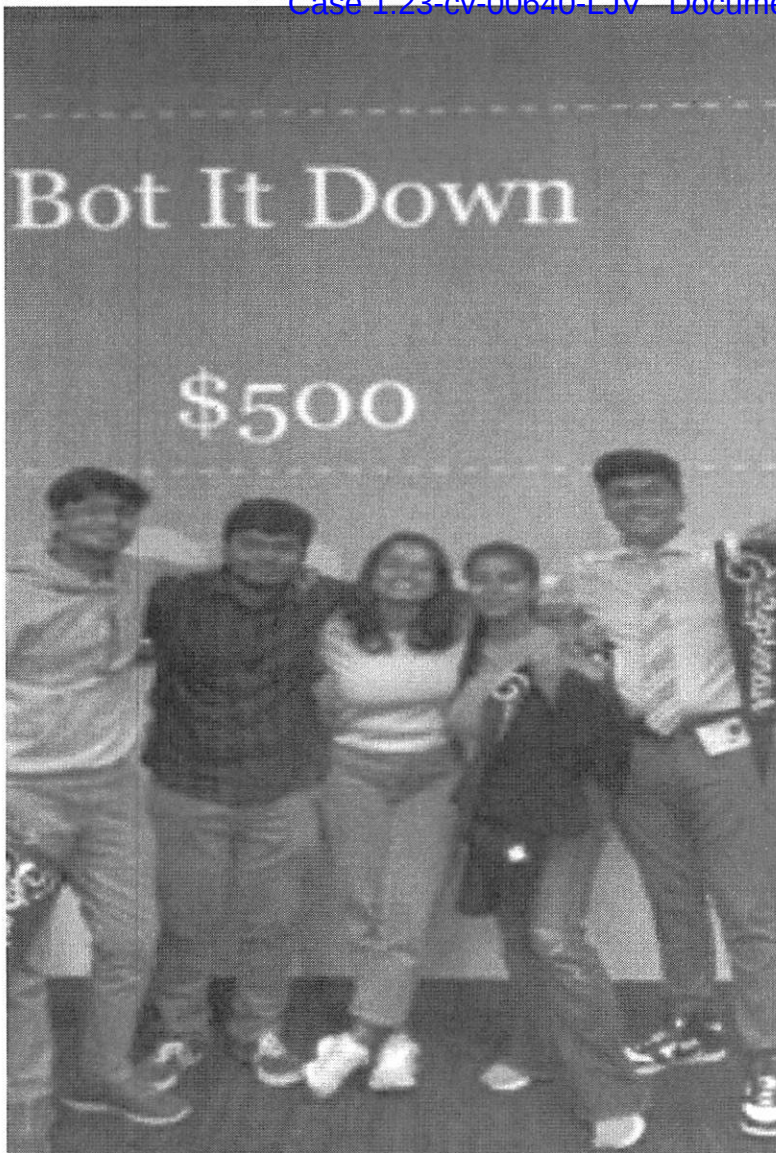
Look what landed in our inbox this morning. When we say we have a billion drying...we mean we have a billion ...see more



2














8:23

LTE **Ryan A. McPherson** • 2ndSustainability Higher Education Executive  
2d • [+ Follow](#)

A new chapter at the WNY Sustainable Business Roundtable with the passing of the gavel yesterday to Whitney Skeans as our new Board Chair!!!! Thank you Stephanie Tisdale, MBA for your fantastic leadership over the past two years and lots of gratitude to Whitney!!!! Alexandra Holland, PhD Goraj, Patrick, Sarah Herbst, Bobbie Thoman, Bonnie Lange Lawrence, Jennifer Brazill, Amanda Pike, Beatrice Goldthwait, Erin Hanaburgh


   55

5 comments • 5 reposts

# Bidding Opportunity for Small Local Contractors

New York State's Empire State Development, through its local nonprofit community organization partners, is seeking contractors to perform façade and commercial space improvements and building stabilization projects such as roofing, masonry, structural repairs, and more.

## JOIN US!

 Tuesday, August 1, 2023  
4:00 PM - 5:30 PM

 Buffalo State University  
1300 Elmwood Avenue  
Bulger Communications Room  
215

## TOPICS TO BE PRESENTED

- *40+ buildings in the pipeline*
- *Project budgets will range from \$50,000-\$300,000+*
- *Façade projects will occur on Jefferson Ave, Fillmore Ave, Bailey Ave and Broadway*
- *Other project work is available in buildings throughout East Buffalo*
- *Minimum of 3 bids accepted/project, opportunity to bid on several projects*

## TO REGISTER

Scan QR Code



Or call/email Donald Williams at the Buffalo State Small Business Development Center.

[williada05@buffalostate.edu](mailto:williada05@buffalostate.edu)  
716-878-4030

HOSTED BY: EMPIRE STATE DEVELOPMENT, EAST SIDE AVENUES, CITIZENS ALLIANCE IN PARTNERSHIP WITH THE BLACK CHAMBER OF COMMERCE, PRESERVATION BUFFALO NIAGARA, HEART OF THE CITY NEIGHBORHOODS, INC, BROADWAY FILLMORE NEIGHBORHOOD HOUSING SERVICES, BUFFALO STATE SMALL BUSINESS DEVELOPMENT CENTER, UB REGIONAL INSTITUTE, UB SCHOOL OF ARCHITECTURE AND PLANNING